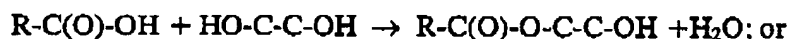


**REMARKS**

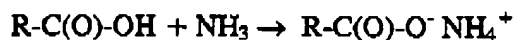
Claims in the Application. Claim 14 has been amended. Claims 16-18 have been added to this application. Claims 1-18 are active in this application. Reconsideration is respectfully requested.

Examiner's Rejection of the Claims Over *Horn et al.* The Examiner has rejected Claim 1, 3, 5-6 and 10-15 under 35 U.S.C. § 103(a) as being unpatentable over WO 98/25985 as well as U.S. Patent No. 6,169,124 (collectively "*Horn*"). This ground for rejection is traversed.

Applicant's claims specifically recite a "fatty acid condensation product". A condensation product is a reaction product of two or more reactants wherein water is formed. Exemplary condensation products are:



The Examiner notes that *Horn* discloses the reaction of ammonia with a fatty acid to render a salt. However, the reaction of ammonia with a fatty acid is not a condensation product:



*Horn* discloses the formation of salt compounds, *not* the formation of condensation products. Thus, *Horn* does not disclose a fatty acid condensation product.

The Examiner misconstrues Applicant's specification. While line 4 of page 5 of Applicant's specification discloses oleic acid and lines 13-15 of page 5 discloses amines and amino alcohols, lines 20-21 of page 4 clearly recites that the "fatty acid condensation products suitable for the practice of the present invention can be prepared from fatty acids and alcohols, amino alcohols, amines or mixtures thereof." In other words, the condensation products of Applicant may be products of fatty acids and alcohols, fatty acids and amino alcohols and fatty

acids and amines or fatty acids mixtures of alcohols, amino alcohols and amines. The reference to oleic acid and amines and amino alcohols in Applicant's specification are mere examples of suitable fatty acids and amines and amino alcohols to produce the claimed fatty acid condensation products.

Further, the fatty acid condensation product in *Horn* functions as a surfactant, not as an IMR agent. See lines 9-12 of column 23 of *Horn*:

Suitable surface-active substances are, for example, compounds which serve to aid the homogenization of the starting materials and may also be suitable for regulating the cell structure.

Newly added Claim 18 recites the amount of fatty acid condensation product in the polyurethane-forming mixture to be effective to remove the molded foam article from the mold without destroying the article.

Examiner's Rejection of the Claims Over Horn et al. in view of Clatty The Examiner has maintained the rejection of Claims 2 and 4 under 35 U.S.C. § 103(a) as being unpatentable over *Horn et al* and further in view of U.S. Patent No. 4,751,252 ("*Clatty*"). This ground for rejection is likewise traversed.

Both Claims 2 and 4 are dependent on Claim 1. *Horn* does not teach the invention set forth in Claim 1 for the reasons set forth above. *Clatty* fails to cure the deficiencies of *Horn*.

Further, *Clatty* does not disclose use of an IMR-enhancer compound and thus does not disclose the combination of IMR-enhancer compound with a release agent. Claims 2 and 4 of Applicant recite an "A" side composition containing both IMR enhancer compound and a release agent (the fatty acid condensation product). At best therefore, the passage of *Clatty*, relied upon by the Examiner, discloses mixing the polyisocyanate with a mold release agent.

Examiner's Rejection of the Claims Over Slocum et al. The Examiner has further rejected Claims 7-9 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,019,317 ("*Slocum*"). This ground for rejection is likewise traversed.

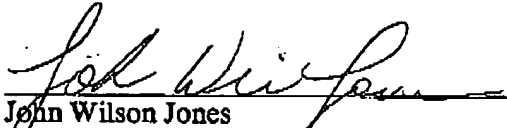
*Slocum* does not disclose a method of preparing a composition by reacting a fatty acid condensation product with an isocyanate in the presence of zinc carboxylate. *Slocum* discloses reacting an organic isocyanate component (prepared from a polyisocyanate and a fatty acid ester) with an isocyanate reactive component consisting of a mixture which may contain zinc carboxylate. In other words the organic isocyanate component has already been prepared *prior to* introduction of the isocyanate reactive component containing zinc carboxylate. (A careful reading of *Slocum* shows that a mixture of *fatty acid* and isocyanate may be reacted with the isocyanate reactive component but not a fatty acid ester and isocyanate.)

The Examiner further admits that the zinc carboxylate in *Slocum* is not an IMR-enhancer compound. It is unclear as to why the "existence" of the zinc carboxylate would have the effect of an IMR-enhancer compound based on the disclosure in column 1 of *Slocum*. The Examiner's reasoning is based entirely on conjecture and is unsupported. Why would one of skill in the art conclude that the zinc carboxylate of *Slocum* would function as an IMR-enhancer compound, especially when zinc carboxylate (as a component of the isocyanate reactive component) is reacted with the organic isocyanate component which is derived from a fatty acid ester?

Conclusion. The claims of Applicant are distinguishable over the cited references for the reasons stated above. The Examiner is invited to telephone the undersigned should he deem it prudent to expedite the processing of this application.

Respectfully submitted,

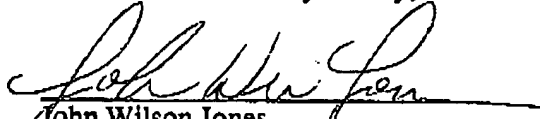
Date: July 9, 2004

  
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**CERTIFICATE OF TRANSMISSION, 37 C.F.R. § 1.6(d)**

I hereby certify that this correspondence is being transmitted to Examiner Allan R. Kuhns at the United States Patent and Trademark Office on this the 9<sup>th</sup> day of July, 2004 via facsimile, (703) 872-9306.

  
John Wilson Jones